

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

LAURA PENDERGEST-HOLT,
R. ALLEN STANFORD, GILBERTO
LOPEZ, JR. and MARK KUHRT,
Plaintiffs,

vs.

CERTAIN UNDERWRITERS AT
LLOYD'S OF LONDON and ARCH
SPECIALTY INSURANCE
COMPANY,
Defendants.

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CIVIL ACTION NO.: 4:09-cv-03712

**MOTION TO JOIN LAURA PENDERGEST-HOLT'S, GILBERT LOPEZ'S
AND MARK KUHRT'S MOTION FOR PROTECTIVE ORDER**

Before the Court is R. Allen Stanford (hereafter "Stanford") files this Motion Join the Motion For Protective Order by Laura Pendergest-Holt, Gilbert Lopez, and Mark Kuhrt. This request is necessary to efficiently and equitably resolve the civil and criminal faced by Stanford. Stanford would show the Court as follows:

1. Certain Underwriters at Lloyd's of London and Arch Specialty Insurance Company (hereafter Lloyd's") sent Stanford their First Set of Interrogatories, Request for Admission, and Request for Production on July 4, 2010. Stanford responded on July 15, 2010 (Exhibit A-1). Stanford is faced with the choice of answering discovery in this action, in which case

- he waives his Fifth Amendment privilege against self-incrimination, or invoking the privilege in this action and risking adverse inferences.
2. For the preceding reason, Stanford hereby adopts and incorporates in full the arguments and authorities set forth in the Motion For Protective Order by Plaintiffs Laura Pendergest-Holt, Gilbert Lopez, and Mark Kuhrt.

WHEREFORE, Plaintiff R. Allen Stanford respectfully requests that the Court grant the Stanford's Motion to Join the Motion For Protective Order in its entirety.

Respectfully submitted,

/s/ Robert S. Bennett
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ROBERT ALLEN STANFORD

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FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

LAURA PENDERGEST-HOLT,	§	
R. ALLEN STANFORD, GILBERTO	§	
LOPEZ, JR. and MARK KUHRT,	§	
<i>Plaintiffs,</i>	§	CIVIL ACTION NO.: 4:09-cv-03712
	§	
vs.	§	
	§	
CERTAIN UNDERWRITERS AT	§	
LLOYD'S OF LONDON and ARCH	§	
SPECIALTY INSURANCE	§	
COMPANY,	§	
<i>Defendants.</i>	§	

ORDER

Upon consideration of the Plaintiff R. Allen Stanford's Motion to Join Laura Penderget-Holt's, Gilbert Lopez's and Mark Kuhrt's Motion For Protective Order, the responses and replies thereto, the evidence submitted by all parties, and the arguments of counsel, the Court is of the opinion that R. Allen Stanford's motion is GRANTED in its entirety.

It is therefore ORDERED that R. Allen Stanford adopts Laura Penderget-Holt's, Gilbert Lopez's and Mark Kuhrt's Motion For Protective Order.

SIGNED at Houston, Texas, this _____ day of _____, 2010.

Nancy F. Atlas
United States District Judge

CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of July, 2010, I electronically filed the foregoing document with the Clerk of Court Using the CM/ECF system which sent notification of such filing to all parties of record.

/s/ Robert S. Bennett
Robert S. Bennett